



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 25, 2023

BY ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Whitehead, 22 Cr. 692 (LGS)

Dear Judge Schofield:

The parties respectfully submit the following proposed dates for the filing of any motions *in limine*:

- Motions *in limine* shall be filed by January 12, 2024;
- Oppositions shall be filed by January 26, 2024; and
- Replies shall be filed by February 7, 2024.

The parties also propose a filing date of February 13, 2024, for joint proposed requests to charge, *voir dire*, and verdict sheets. In addition, the parties respectfully advise the Court as to the following:

- The Government plans to disclose 3500 and *Giglio* materials beginning on February 13, 2024, and on a rolling basis;
- The defense will disclose 26.2 materials on February 23, 2024, and on a rolling basis; and
- The defense will disclose defense exhibits to the Government on February 23, 2024.

Respectfully submitted,

DAMIAN WILLIAMS
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